EXHIBIT 1

Expert Report of

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MODFLOW-96. Simulated mass loading occurred at a constant rate of 1,200 grams per day using monthly stress periods representing the period January 1953–December 1984. The complete simulation time was represented by the period January 1951–December 1994. Until 1984, the vast majority of simulated PCE-contaminated groundwater was supplied to the Tarawa Terrace WTP by well TT-26. Simulated breakthrough of PCE at well TT-26 at the current MCL of 5 µg/L occurred during January 1957. Corresponding breakthrough at the location of well TT-23 occurred during December 1974; however, well TT-23 was not operational until about August 1984.

Simulated maximum and average PCE concentrations at well TT-26 following breakthrough were 851 µg/L and 414 µg/L, respectively. Corresponding maximum and average concentrations at well TT-23 subsequent to the onset of operations were 274 µg/L and 252 µg/L, respectively. Simulated breakthrough of PCE in finished water at the Tarawa Terrace WTP occurred at the current MCL concentration of 5 µg/L during November 1957 and remained at or above a concentration of 40 µg/L from May 1960 until the termination of pumping at water-supply well TT-26 during February 1985. Computed maximum and average PCE concentrations at the WTP were 183 µg/L and 70 µg/L, respectively, during the period November 1957–February 1985, when well TT-26 was removed from service.

Chapter G: Simulation of Three-Dimensional Multispecies, Multiphase Mass Transport of Tetra- chloroethylene (PCE) and Associated Degradation By-Products (Jang and Aral 2008) provides detailed descriptions and analyses of the development and application of a three-dimensional model (TechFlowMP) capable of simulating multispecies and multiphase (water and vapor) transport of PCE and associated degradation by-products—TCE, 1,2-tDCE, and VC. The development of the TechFLowMP model is described in Jang and Aral (2005) and its application to Tarawa Terrace and vicinity also is published as report MESL-02-07 by the Multimedia Environmental Simulations Laboratory in the School of Civil and Environmental Engineering, Georgia Institute of Technology (Jang and Aral 2007). Simulation results show that the maxi- mum concentrations of PCE degradation by-products, TCE, 1,2-tDCE, and VC, generally ranged between10 µg/L and 100 µg/L in Tarawa Terrace water-supply well TT-26 and between 2 µg/L and 15 µg/L in finished water delivered from the Tarawa Terrace WTP. As part of the degradation by-product simulation using the TechFlowMP model, results were obtained for PCE and PCE degradation by-products dissolved in groundwater and in the vapor phase (above the water table in the unsaturated zone). Analyses of the distribution of vapor- phase PCE and PCE degradation by-products indicate there is potential for vapors to enter buildings at Tarawa Terrace, thereby providing a potential exposure pathway from inhalation of PCE and PCE degradation by-product vapors. At Tarawa Terrace these buildings would include family housing and the elementary school.

Chapter H: Effect of Groundwater Pumping Schedule Variation on Arrival of Tetrachloroethylene (PCE) at Water-Supply Wells and the Water Treatment Plant (Wang and Aral 2008) describes a detailed analysis of the effect of groundwater pumping schedule variation on the arrival of PCE at water-supply wells and at the Tarawa Terrace WTP. Analyses contained in this chapter used the calibrated model parameters described in Chapter C (Faye and Valenzuela In press 2007) and Chapter F (Faye In press 2007b) reports in combination with the groundwater pumping schedule optimization system simulation tool (PSOpS) to assess the influence of unknown and uncertain historical well operations at Tarawa Terrace water-supply wells on PCE concentrations at water-supply wells and at the Tarawa Terrace WTP. This chapter also is published as report MESL-01-07 by the Multimedia Environmental Simulations Laboratory in the School of Civil and Environ- mental Engineering, Georgia Institute of Technology (Wang and Aral 2007). Variation in the optimal pumping schedules indicates that the arrival time of PCE exceeding the current MCL of 5 µg/L at water-supply well TT-26 varied between May 1956 and August 1959. The corresponding arrival time of PCE exceeding the current MCL of 5 µg/L at the Tarawa Terrace WTP varied between December 1956 and June 1960.